

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

JUAN JOSE PERAZA MORA and GLORIA  
ESTHER BATISTA MOLINA,

Debtors.

Chapter 12

Case No. 19-01896(ESL)

**MOTION SUBMITTING EXHIBIT TO SETTLEMENT AGREEMENT**

**TO THE HONORABLE ENRIQUE S. LAMOUTTE  
U.S. BANKRUPTCY JUDGE:**

**COME NOW**, Triangle Cayman Asset Company, LLC (“Triangle”), and Juan J. Peraza Mora & Gloria E. Batista Molina (the “Debtors”, together with Triangle, the “Parties”), through their respective undersigned counsel, and very respectfully state and pray as follows:

1. After lengthy negotiations, the Debtors and Triangle reached an agreement as to the treatment to be provided under Debtors’ plan of reorganization. To this end, the parties, executed a Settlement Agreement (the “Settlement Agreement”).

2. On April 23, 2020, the Debtors filed a *Motion Submitting Stipulation for the Treatment of Claim for Secured Creditor, Triangle Cayman Asset Company* (the “Motion”), including the Settlement Agreement as “Exhibit 1” to the Motion. See Docket Nos. 148 and 148-1.

3. The Settlement Agreement, in turn, refers to “Exhibit A”, which is the Judgment entered by the PR District Court for the District of Puerto Rico, in Civil Case No. 17-01216-CCC, in favor if Triangle.

4. By inadvertence, Exhibit A was not included as exhibit to the Settlement Agreement, filed at Docket No. 148. Therefore, the Parties herein include **Exhibit A** to the Settlement Agreement.

5. For the reasons stated above, Triangle respectfully requests that this Court takes notice of the above stated and that Exhibit A to the Settlement Agreement, included herein, be considered an integral part of Docket No. 148.

**WHEREFORE**, the Parties respectfully request that this Court to take notice of “Exhibit A” to the Settlement Agreement, which is being included herein, and that the same be considered an integral part of Docket No. 148.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 5<sup>th</sup> day of May 2018.

**WE HEREBY CERTIFY** that a copy of this MOTION has been served electronically through the CM/ECF system to: The US Trustee for the District of Puerto Rico, The Chapter 12 Trustee JOSE CARRION and to all attorneys and creditors that have filed a notices of appearance in the case. All non-CM/ECF participants will be notified by first class mail as per the Master Address List included herein.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

TRIANGLE CAYMAN ASSET  
COMPANY, LLC

Plaintiff

vs

JUAN JOSE PERAZA MORA,  
GLORIA ESTHER BATISTA  
MOLINA, and the legal conjugal  
partnership between them

Defendants

CIVIL 17-1216CCC

**JUDGMENT**

For the reasons stated in the Opinion and Order of this same date, it is ORDERED and ADJUDGED that judgment be and is hereby entered in favor of plaintiff Triangle Cayman Asset Company, LLC and against defendants Juan José Peraza Mora and Gloria Esther Batista Molina, and the legal conjugal partnership between them, in the amount of \$441,592.87 as to Loan Agreement I, comprised of \$373,321.88 in principal, \$64,754.25 in interest, \$3,516.74 in late fees, and a per diem of \$33.24, and \$2,742,954.11 as to Loan Agreement II, comprised of \$1,993,223.12 in principal, \$646,344.26 in interests, \$30,854.23 in late fees, \$71,600.00 in legal expenses, \$941.50 in valuation expenses, and a per diem of \$332.20.

SO ORDERED AND ADJUDGED.

At San Juan, Puerto Rico, on March 6, 2019.

S/CARMEN CONSUELO CEREZO  
United States District Judge